



EDELMAN, COMBS, LATTURNER & GOOD

20 S. Clark, Suite 1500

Chicago, Illinois 60603

Phone 312/739-4200

Fax 312/419-0379

Email: info@edcombs.com

www.edcombs.com

January 13, 2020

VIA ECF

Honorable Judge Analisa Torres

United States District Court

Southern District of New York

500 Pearl St.

New York, NY 10007-1312

Re: *Rubin v. Montefiore Medical Center*; 18-cv-11066-AT-DCF

Dear Judge Torres:

Plaintiff, Jonathan Rubin, respectfully submits this request for an extension of time to file his unredacted Motion to Supplement Response to Defendant's Motion for Summary Judgment under seal until January 17, 2020.

On January 9, 2020, Plaintiff's counsel, Abraham Kleinman, delivered in-person the unredacted Motion to Supplement Response to Defendant's Motion for Summary Judgment to the Court for filing under seal. (Exhibit A).

However, on January 13, 2020, the undersigned received the entire set of documents that Mr. Kleinman delivered to the Court to be filed under seal in a Federal Express package from the clerk of the Court. This was the first time Plaintiff's counsel became aware that the January 9, 2020 in-person filing was not accepted by the clerk of the Court.

Following receipt of the package, the undersigned and Mr. Kleinman called the clerk of the Court who explained why the package was returned and what corrective measures were needed. Counsel having now taken the corrective steps outlined by the clerk of the Court, requests a brief extension of time up to and including January 17, 2020 to file his unredacted Motion to Supplement Response to Defendant's Motion for Summary Judgment under seal.

This is Plaintiff's second request for an extension of time to file his unredacted Motion to Supplement Response to Defendant's Motion for Summary Judgment under seal. The original date provided by the Court was January 7, 2020. Plaintiff's first request for an extension was filed on January 6, 2020 (Dkt No. 60). Plaintiff's request was granted.

Plaintiff's counsel has conferred with Defendant's counsel concerning this request for an additional time, and Defendant's counsel does not oppose this request.

Wherefore, Plaintiff respectfully requests an extension of time up to and including January 17, 2020 to file the unredacted Motion to Supplement Response to Defendant's Motion for Summary Judgment under seal.

Respectfully,

/s/Tiffany N. Hardy
Tiffany N. Hardy

Tiffany N. Hardy
EDELMAN, COMBS, LATTURNER
& GOODWIN, LLC
20 South Clark Street, Suite 1500
Chicago, Illinois 60602
Phone: (312) 739-4200
Fax: (312) 419-0379

GRANTED. By **January 17, 2020**,
Plaintiff shall file his motion under seal.

SO ORDERED.

Dated: January 14, 2020
New York, New York



ANALISA TORRES
United States District Judge